



October 12, 2010

Mr. Aaron Todd
Rebuild Iowa Office
502 E 9th St., 2nd Floor,
Des Moines, IA 50319

RE: Iowa Smart Planning Task Force Draft Recommendations

Dear Mr. Todd:

The Iowa Farm Bureau Federation (IFBF), the state's largest general farm organization with almost 154,000 members, wishes to share these comments regarding the Iowa Smart Planning Task Force draft recommendations that are intended to provide greater support for local and regional planning.

Farm Bureau appreciates the time and effort of the task force to consider ways to increase community resiliency, proactively foster economic development and improve the state's quality of life. It is important for all levels of government to always be looking for ways to incorporate many of these principles into their daily functions.

General Comments

In general, Farm Bureau submits these comments regarding all the recommendations and encourages the task force to incorporate them into the draft report's principles:

1. Coordination of local, regional and state planning for transportation, flood impact reduction and watershed needs can help reduce government duplication and costs. It is important for agencies and local governments to find ways to better coordinate their efforts and increase efficiencies to balance the budget.
2. Coordination and planning for these purposes is the responsibility of all levels of government. The costs associated with this planning and coordination need to be prioritized by the various state agencies and local governments and paid for with current resources.
3. The legislature should not be giving new authority for state or local governments to levy new property taxes, franchise fees or energy taxes to raise funds for smart planning and coordination. In an effort to be fiscally responsible, the state legislature should be reducing state expenditures and financial impacts on local governments.
4. New state agencies or offices do not need to be created for these purposes, especially in poor economic times.

5. Any local, regional or state plans that force costly state or local regulations on private property owners, or that infringe upon property rights, must be avoided.
6. Local watershed planning should include a coalition of agricultural, conservation and public interests.

Specific Recommendations

Regarding the specific recommendations in the draft report, Farm Bureau offers these comments:

1. Establish a framework to coordinate planning, geographic information and data systems, and state-level investment; 1.1. Establish the GIS & Data Systems and Planning Coordination Councils, and the Office of Planning and Geographic Information Systems (OPGIS); and, 1.2. Integrate the Smart Planning Principles into the State's Enterprise Strategic Planning Process.

- Coordination of planning and sharing of information seems to be a current responsibility and function of all levels of government. This is not the time to be creating a new government office or adding staff to do this.

1.3. Iowa Councils of Government (COGs) should serve as the geographic entities for regional smart plans; and 1.4. A Planning Advisory Committee (PAC) for each region should be established by the COGs for local smart plan review.

- Aren't the COGs supposed to be doing this already (or at least could be and should be doing this)? If so, this is not a recommendation but a statement of an ongoing current responsibility.

1.6. Identify "State of Iowa Smart Planning Goals and Benchmarks" as statewide goals for the OPGIS.

- In the Goals and Benchmarks, Strategy 4.2 - The terms "natural resource protection areas" and "agricultural protection areas" need to be further defined. The final report should recognize the need to keep Iowa's prime farmland open for modern agricultural production. Farm Bureau policy opposes plans that force costly state or local regulations on private property owners, or that infringe upon property rights. Any action by government that significantly diminishes an owner's right to use his property constitutes a taking of that owner's property. Any final plan should provide due process and reasonable compensation for the amount the owner's right has been diminished. We oppose agency regulations which unreasonably encroach on the rights of property owners.

2. Require completion of regional comprehensive smart plans within 5 years after legislation is enacted; 3. Create financial incentives and offer technical assistance to incent smart planning at both the regional and local levels; 3.1. Create a sustainable funding source for regional smart planning conducted by the COGs; and, 3.2. Create a sustainable funding source for a smart planning grant program at the state level for local smart plan development and implementation.

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- Farm Bureau asks for more comprehensive analysis of the budget impact of this recommendation. In an effort to be fiscally responsible, the state legislature should be reducing expenditures and increasing efficiencies to balance the budget. When establishing a budget for state spending for agencies and programs, we feel that it is important that agriculture, conservation, property tax credits, K-12 and higher education, and public safety should be funding priorities.
- The legislature should not be giving new authority for state or local governments to levy new property taxes, franchise fees or energy taxes to raise funds for smart planning and coordination. In an effort to be fiscally responsible, the state legislature should be reducing state expenditures and financial impacts on local governments.

3.3. Expand the menu of financing options available to local governments to develop and implement smart plans.

- Counties already have the authority to assess levies to do this if they prioritize these activities.

3.5. State agencies should set a threshold of or give additional consideration for having a qualified smart plan to receive state funding for infrastructure and public facilities projects that affect land use, transportation, stormwater management, and floodplain protection, where appropriate.

- A qualified plan should not diminish a property's owner's right to use his property constitutes a taking of that owner's property. The government should provide due process and reasonable compensation for the amount the owner's right has been diminished. We oppose agency regulations which unreasonably encroach on the rights of property owners.

3.6. Create a smart planning education program for local government staff, officials, and the public; and, 3.7. Develop a smart planning toolbox to be housed at OPGIS that will serve as a one-stop-shop for smart planning information and resources.

- Who will design and implement the plan and toolbox? This should be more clearly identified to better understand the total financial impact from these recommendations.

3.8. Develop an accessible statewide GIS and data management system.

- While the system may not exist, the data does. DNR may be the largest repository of currently relevant data. The DNR would be the most likely coordinator for this function.

4. Develop a watershed planning and coordination program, including goals and strategies referencing land use for each of Iowa's nine major river basins.

- Other agencies involved in watershed planning should be identified in this recommendation, such as the Iowa Department of Agriculture and Land Stewardship. In addition, this recommendation should recognize that the Water Resources Coordinating Council and these respective agencies already have been charged with these functions. Watershed planning should include the prioritization of our watersheds so as to use limited state and federal resources more effectively.
- Local watershed planning should include a coalition of agricultural, conservation and public interests.

Again, these comments are intended to improve the Iowa Smart Planning Task Force draft recommendations to provide greater support for local and regional planning. If you should have any questions about these issues, please contact me at 225-5432. Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Rick Robinson". The signature is written in a cursive, flowing style.

Rick Robinson
Environmental Policy Advisor